Case 1:23-cv-00496-VSB Document 19 APRILIGIATION GRANTED

CLIFTON BUDD & SO ORDERED No. 3

ATTORNEYS A VERNON S. BRODERICK

THE EMPIRE STATE BUILDING 350 FIFTH AVENUE, 61ST FLOOR NEW YORK, NY 10118

U.S.D.J. 5/11/2023

Defendant will respond to Plaintiff's complaint by May 17, 2023.

Ma, .., _._.

VIA ECF

The Honorable Vernon S. Broderick, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, NY 10007

> Re: Bose v. Young Adult Institute, Inc. d/b/a YAI

> > Case No. 1:23-cv-00496-VSB

Dear Judge Broderick:

This firm represents defendant Young Adult Institute, Inc. d/b/a YAI ("Defendant") in the above-referenced action. Pursuant to Section 1(G) of Your Honor's Individual Rules & Practices in Civil Cases, we write—with Plaintiff's consent—to respectfully request a one (1) week extension of time, from May 10, 2023, through and including May 17, 2023, for the Defendant to move, answer, or otherwise respond to the Complaint.

The parties are still working to see if a motion to dismiss can be avoided. The undersigned requested an extension of time on April 25 due to being out of the office for a substantial period with an illness. Since returning to the office, discussions have continued, but additional time is required to bring these discussions to their conclusion.

This is the fourth and final request for an extension of time to move, answer, or otherwise respond to the Complaint. There are no other deadlines in this matter that would be affected by the requested extension. The Defendant does not intend to ask for another extension of time.

We thank the Court for its consideration of this request.

Respectfully submitted,

CLIFTON BUDD & DEMARIA, LLP

Attorneys for Defendant

Ian-Paul A. Poulos By:

VIA ECF

LEE LITIGATION GROUP

Attorneys for the Plaintiff

The details have been purposefully left out of this letter, but if a conference is needed to provide more information to the Court off the public record, the undersigned will be available at the Court's convenience.